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October 26, 2021

**VIA ECF**

Honorable Magistrate Judge Marcia M. Henry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *The Federal Savings Bank v. Paul J. Manafort, Kathleen B. Manafort, et al.*  
Case No.: 21-cv-1400

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Dear Magistrate Judge Henry:

We represent Plaintiff The Federal Savings Bank ("TFSB"). This is to respond to the opposition filed by Defendants' counsel to our letter motion to compel Defendants to immediately produce all documents responsive to TFSB's document demand. The Court will note first that Defendants do not deny that they have not produced a single document to TFSB in this case and that the deadline for Defendants to respond and produce documents to TFSB's document demand expired on October 13, 2021. While counsel's denies that he has abrogated this Court's role in deciding extension requests, he again states that he will simply comply with the extended discovery date Defendants' requested notwithstanding that the Court has not granted any such extension.

The Court will further note that Defendants' counsel denies that Judge Hall, during a conference held on August 5, 2021, instructed the parties that discovery in this matter would be both: (i) expedited (stating that the fact discovery deadline of January 14, 2022 fixed in the Scheduling Order so ordered during the Initial Conference held on July 22, 2021 **was 'too long'**) and (ii) limited given the fact that the commercial loans at issue matured over three and one half years ago and given Judge Hall's acknowledgement that TFSB can establish a *prima facie* entitlement to summary judgment right now.

**We respectfully request that your Honor consult with Judge Hall about the foregoing to learn who is not being truthful to you.**

Respectfully submitted,

Thomas J. McGowan

cc: Rodney Perry, Esq.